

**FILED**

**MAY - 2 2008**

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

1 ARTHUR W. CURLEY, BAR NO. 60902  
BERNADETTE BANTLY, BAR NO. 124659  
2 MEGHAN E. OLIVERI, BAR NO. 236107  
BRADLEY, CURLEY, ASIANO,  
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6 Attorneys for Defendant  
BHARAT RAKSHAK, DDS

7  
8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN JOSE DIVISION

11 TRUSTEES OF THE TRI-COUNTIES  
WELFARE TRUST FUND and  
12 PROFESSIONAL GROUP  
ADMINISTRATORS, INC., a corporation,

13 Plaintiffs,

14 v.

15  
16 BAHARAT RAKSHAK, DDS, a  
professional dental corporation, d/b/a  
17 RODEO DENTAL GROUP; LYNNE  
SIMMS, D.D.S., a professional dental  
18 corporation, d/b/a RODEO DENTAL  
GROUP; JESSICA HUANTE,  
19 individually; BAHARAT RAKSHAK,  
individually; LYNNE SIMMS,  
20 individually; and DOES 1 through 15,  
inclusive,

21 Defendants.  
22

No. C-07-06332 RMW

STIPULATION AND ~~PROPOSED~~ ORDER  
REGARDING DISCOVERY

23 For purposes of economy, efficiency and to minimize inconvenience to witnesses, IT IS  
24 HEREBY STIPULATED AND AGREED by and between the parties hereto, by their respective  
25 counsel, that any and all discovery, including but not limited to depositions, production of  
26 documents, interrogatories, and requests for admissions, taken in the case: *Good Samaritan*  
27 *Hospital LP, d/b/a Good Samaritan Hospital, a California limited partnership v. Tri-Counties*  
28 *Health and Welfare Trust Fund, a health plan insurer; Pacific Health Alliance, Inc., a California*

corporation; Rodeo Dental Group, a California business and Does 1-50, inclusive, California Superior Court, Santa Clara County, Case No. 107CV095539, may be used for all purposes, subject to applicable evidentiary objections, in the above captioned federal action. Effective immediately, undersigned parties agree to provide notice and service of all discovery requests, responses to all parties in both cases.

Dated: April 1, 2008

BEESON TAYER & BODINE, APC

By: 

TEAGUE P. PATERSON  
Matthew Morsello, Esq.  
Attorneys for Plaintiff  
TRUSTEES OF THE TRI-  
COUNTIES WELFARE TRUST  
FUND and PROFESSIONAL  
GROUP ADMINISTRATORS, INC.  
Attorneys for Defendant  
TRI-COUNTIES HEALTH AND  
WELFARE TRUST FUND

Dated: April 1, 2008

BRADLEY, CURDEY, ASIANO,  
BARRABEE & GALE, P.C.

By: 

BERNADETTE BANTLY  
Attorneys for Defendant  
BHARAT RAKSHAK, DDS  
Attorneys for Defendant  
RODEO DENTAL GROUP

Re: *Good Samaritan Hospital v. Tri-Counties Health and Welfare Trust Fund, et al.*, Santa Clara County Superior Court Case No. 107CV095539:

Dated: April 1, 2008

HOOVER LUNDY & BOOKMAN, INC.

By: 

MICHAEL A. DUBIN  
Glenn E. Solomon, Esq.  
Attorneys for Plaintiff  
GOOD SAMARITAN HOSPITAL  
LP

Dated: April 1, 2008

WOLD LAW GROUP

By: 

JAMES WOLD  
Attorneys for Defendant  
PACIFIC HEALTH ALLIANCE,  
INC.

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 5/2/08

  
HONORABLE RONALD M. WHYTE